

**THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH
SUPERIOR COURT**

Rockingham Superior Court
Rockingham Cty Courthouse/PO Box 1258
Kingston NH 03848-1258

Telephone: 1-855-212-1234
TTY/TDD Relay: (800) 735-2964
<http://www.courts.state.nh.us>

SUMMONS IN A CIVIL ACTION



Case Name: **Angela Taddeo v Pacarctic, LLC**
Case Number: **218-2021-CV-00586**

Date Complaint Filed: June 09, 2021

A Complaint has been filed against Pacarctic, LLC in this Court. A copy of the Complaint is attached.

The Court ORDERS that ON OR BEFORE:

July 25, 2021	Angela Taddeo shall have this Summons and the attached Complaint served upon Pacarctic, LLC by in hand or by leaving a copy at his/her abode, or by such other service as is allowed by law.
August 15, 2021	Angela Taddeo shall electronically file the return(s) of service with this Court. Failure to do so may result in this action being dismissed without further notice.
30 days after Defendant is served	Pacarctic, LLC must electronically file an Appearance and Answer or other responsive pleading form with this Court. A copy of the Appearance and Answer or other responsive pleading must be sent electronically to the party/parties listed below.

Notice to Pacarctic, LLC: If you do not comply with these requirements you will be considered in default and the Court may issue orders that affect you without your input.

Send copies to:

John E. Durkin, ESQ

Pacarctic, LLC

Burns Bryant Cox Rockefeller & Durkin PA 255 Washington
Street Dover NH 03820
3800 Centerpoint Drive Ste 502 Anchorage AK 99503

BY ORDER OF THE COURT

June 10, 2021

(1075)

Jennifer M. Haggard
Clerk of Court

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NOTICE TO DEFENDANT

Case Name: **Angela Taddeo v Pacarctic, LLC**
Case Number: **218-2021-CV-00586**

You have been served with a Complaint which serves as notice that this legal action has been filed against you in the **Rockingham Superior Court**. Review the Complaint to see the basis for the Plaintiff's claim.

Each Defendant is required to electronically file an Appearance and Answer 30 days after service. You may register and respond on any private or public computer. For your convenience, there is also a computer available in the courthouse lobby.

If you are working with an attorney, they will guide you on the next steps. If you are going to represent yourself in this action, go to the court's website: www.courts.state.nh.us, select the Electronic Services icon and then select the option for a self-represented party.

1. Complete the registration/log in process. Click Register and follow the prompts.
2. After you register, click Start Now. Select **Rockingham Superior Court** as the location.
3. Select "I am filing into an existing case". Enter **218-2021-CV-00586** and click Next.
4. When you find the case, click on the link and follow the instructions on the screen. On the "What would you like to file?" screen, select "File a Response to Civil Complaint". Follow the instructions to complete your filing.
5. Review your Response before submitting it to the court.

IMPORTANT: After receiving your response and other filings the court will send notifications and court orders electronically to the email address you provide.

A person who is filing or defending against a Civil Complaint will want to be familiar with the Rules of the Superior Court, which are available on the court's website: www.courts.state.nh.us.

Once you have registered and responded to the summons, you can access documents electronically filed by going to <https://odypa.nhecourt.us/portal> and following the instructions in the User Guide. In that process you will register, validate your email, request access and approval to view your case. After your information is validated by the court, you will be able to view case information and documents filed in your case.

If you have questions regarding this process, please contact the court at 1-855-212-1234.

STATE OF NEW HAMPSHIRE

ROCKINGHAM, SS.

SUPERIOR COURT

218-2021-CV-00586

Case # _____

ANGELA TADDEO)

907 US Route 1)

York, ME 03909)

Plaintiff)

v.)

COMPLAINT

PACARCTIC, LLC)

3800 Centerpoint Drive, Suite 502)

Anchorage, AK 99503 USA)

Defendant)

NOW COMES the Plaintiff, Angela Taddeo, by and through her attorneys, Burns, Bryant, Cox, Rockefeller & Durkin, P.A., by John E. Durkin, Esquire, hereby **demanding trial by jury**, and complains against the Defendant, Pacarctic, LLC as follows:

STATEMENT OF MATERIAL FACTS

1. The Plaintiff is a resident of 907 US Route 1, York, Maine 03909.
2. At all times relative to this claim, Defendant Pacarctic, LLC, was a foreign limited liability company duly registered to do business in the State of New Hampshire, having a principal office address of 3800 Centerpoint Drive, Suite 502, Anchorage, Alaska, USA 99503, and a registered agent, Corporation Service Company, with an address at 10 Ferry Street S313, Concord, New Hampshire 03301.

3. On or about January 24, 2019, and at all times material thereto, Plaintiff, while in the exercise of due care, was lawfully upon the premises of her employer, PAE, at the National Visa Center, in Portsmouth, New Hampshire.
4. On or about January 24, 2019, the Plaintiff, while at her place of employment, PAE, and working out of the National Visa Center, slipped and violently fell on the slippery floor just outside of the cafeteria.
5. The Defendant, Pacarctic, LLC was the cleaning company hired to maintain the premises at the National Visa Center, to include cleaning, polishing, and waxing the floors. The area where the Plaintiff fell had been washed, waxed and polished the previous night, with a wet spot still remaining on the floor the next morning.
6. The Plaintiff slipped and fell on the wet slippery floor sustaining severe and permanent injuries.

COUNT I- NEGLIGENCE

7. The Plaintiff hereby incorporates Paragraphs 1 through 6 as if expressly written herein.
8. The Defendant owed the Plaintiff a duty of reasonable care in the conduct of their business, including proper inspection and maintenance of all common areas; to refrain from creating hazardous conditions which they knew or should have known existed upon the premises; to timely warn the Plaintiff of any hazardous condition which they knew or should have known existed upon the premises; to reasonably employ, train and supervise an adequate number of agents, servants, and

employees to assure the safety of the premises they were hired to maintain; and to otherwise refrain from negligent conduct.

9. Wholly regardless and unmindful of their duties as aforesaid, the Defendant failed in the performance thereof when, acting through their agents, servants and/or employees, breached said duties and caused the floor being used by tenants, guests and employees of the National Visa Center to become wet, slippery and unsafe, and failed to take adequate steps to detect and/or abate the hazardous condition and/or to provide adequate signage or other devices to the Plaintiff of the existence of the hazard.
10. As a proximate and foreseeable result of the Defendant's negligence, the Plaintiff has suffered severe and permanent injuries when, without warning, she slipped and fell on an unsafe, wet and slippery floor at the National Visa Center where she was employed by PAE.
11. As a direct, proximate and foreseeable consequence of the Defendant's negligence, the Plaintiff has suffered serious and permanent injuries including a torn left rotator cuff, including surgical intervention, and suffered damages including the injuries themselves, medical treatment, medical expenses, economic loss, lost wages, disability, pain and suffering, and loss of enjoyment of life, all such damages being past, present and future.
12. In the future the Plaintiff will likely be compelled to expend sums of money for her medical care and treatment and will continue to suffer pain, discomfort and permanent injuries which will impede her ability to work and to enjoy the other usual pursuits of life including hobbies and other related activities.

13. The Plaintiff seeks full, fair and adequate compensation for her injuries, physical and mental pain and suffering accompanying her injuries, medical expenses related thereto, lost wages, economic damages, loss of enjoyment of life, and all other damages past, present and future.

14. All to the damage of the Plaintiff, as she says, in an amount within the jurisdictional limits of this Court.

Respectfully submitted,
ANGELA TADDEO

By and through Her Attorneys,

BURNS, BRYANT, COX, ROCKEFELLER
& DURKIN, P.A.

Date: 06/04/21

By: /S/ John E Durkin
John E. Durkin, Esq.
(N.H. Bar #10983)
255 Washington Street
Dover, NH 03820
Tel: (603) 742-2332
Fax: (603) 749-4970
Email: jdurkin@burnsbryant.com

Merrimack County Sheriff's Office

DAVID A. CROFT
333 Daniel Webster Hwy
Boscawen, NH 03303
Phone: 603-796-6600

PACARCTIC, LLC
10 FERRY ST 313
CONCORD, NH 03301

AFFIDAVIT OF SERVICE

MERRIMACK, SS

6/ 17 /2021

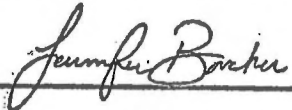
I, DEPUTY JENNIFER L BOUCHER, on this date at 1413 a.m. (p.m.), summoned the within named defendant PACARCTIC, LLC as within commanded, by leaving at the office of Registered Agent Corporation Service Company, 10 Ferry Street, Suite 313, Concord, said County and State of New Hampshire, its true and lawful agent for service of process under and by virtue of Chapter 293-A New Hampshire RSA, as amended, a true and attested copy of this Summons and Complaint.

FEES

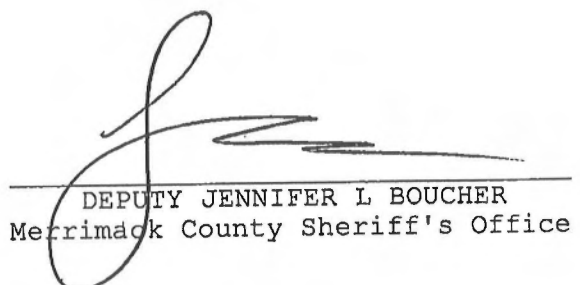
Service	\$25.00
Postage	1.00
Travel	15.00

TOTAL	<u>\$41.00</u>
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A TRUE COPY ATTEST:



DEPUTY BOUCHER
Merrimack County Sheriff's Office


DEPUTY JENNIFER L BOUCHER
Merrimack County Sheriff's Office